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ABSTRACT

This paper identifies various key aspects of the history and administration of federal compensatory education, describes the problems and issues associated with these, and suggests some ways in which research might help further program goals. It is intended as a discussion paper designed to highlight some crucial target areas for a major study of compensatory education to be conducted by the National Institute of Education, in accordance with a provision of the Education Amendments of 1974. The paper contains four chapters. The first chapter describes very briefly the background of the study, the original purposes of Title I, and the way in which its administration was conceived. It also identifies the main issues with which legislators and program administrators must be concerned. The following three chapters then deal with these issues in more detail under the headings of: Resource Distribution. Categorical Aid and School Organization, and Effects of Compensatory Programs on Children. Emphasis throughout is on federal programs, and specifically, on Part A of Title I. An attempt is made to distinguish between those areas which are researchable, and those which are not; that is, between questions of fact and value decisions, even though the latter may be informed by findings on cost, efficiency, and consequences. (Author/CS)

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NOTE: The views and conclusions expressed in this paper are solely those of the authors, and do not necessarily represent the opinions of any other person or of The National Institute of Education.

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I. INTRODUCTION

The Education Amendments of 1974, which were signed into law on August 21, 1974, contain a provision for a major study of compensatory education. The Act instructs the National Institute of Education to design and conduct a study which will: (a) examine the fundamental purposes and effectiveness of compensatory education programs; (b) analyze ways of identifying children in need of compensatory education; (c) consider alternative procedures for distributing compensatory education program funds.[1/]

Such a mandate is, obviously, extremely wide-ranging, and this paper is not intended to cover all relevant issues, or to provide a comprehensive conceptual scheme, but rather to serve as a basis for discussion. In it, we identify various key aspects of the history and administration of federal compensatory education, describe the problems and issues associated with these, and suggest some ways in which research might help further program goals. We also attempt to distinguish between those areas which are researchable, and those which are not; that is, between questions of fact, and what are ultimately value decisions, even though the latter may be informed by findings on cost, efficiency and consequences.

This paper contains four main chapters. This chapter describes, very briefly, the background of the study, the original purposes of Title I, and the way in which its administration was conceived. It

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1/ See Appendix A.

also identifies the main issues with which, in the light of this experience, legislators and program administrators must be concerned. The following three chapters then deal with these issues in more detail, under the headings of Resource Distribution, Categorical Aid and School Organization, and Effects of Compensatory Programs on Children. However, focus throughout is on federal programs, and, specifically, on Part A of Title I (i.e., the basic grant under which the vast bulk of Title I money is disbursed).[2/] No attempt is made here to survey the particular goals and problems of state programs, and the lessons to be learned from them.

A. Background of the Study

In 1965, when the Elementary and Secondary Education Act was passed, the general mood was optimistic. Title I of the Act, which targeted large sums to "meet the special educational needs of educationally deprived children" was seen as an effective and central part of the War on Poverty, as well as a path-breaking reversal of the long-standing opposition to federal aid to education. Many people believed that, as a result of federal legislation, children who were handicapped by their circumstances could be provided with good school programs, keep abreast of their peers, and thus, for the first time, be offered equal educational opportunity.

Title I not only provided the additional funds which it was assumed such programs required, but also included direct provisions

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2/ For a description of current legislative provisions, see Appendix B.

for getting effective programs established in the schools; and as such, appeared to be a victory for the supporters of categorical aid. The uses to which school districts could put the money were limited by the legislation, and the unprecedented evaluation requirement was expected to produce useful information and ensure that, over time, every district involved in the program would develop or adopt proven methods, and so, provide high-quality compensatory education.

A principal supporter of the evaluation requirement was Senator Robert Kennedy, who saw evaluation as a way of providing parents with the information and power necessary to check that the money was indeed used on special programs in low-income areas, and not diverted to other uses or transformed into general aid. After their experiences with Title I, Kennedy hoped parents would turn their attention to the quality and results of regular school instruction. Other reformers saw Title I evaluation as a pilot effort in restructuring and revitalizing federal education programs. During this period, use of the Program Planning and Budgeting System (PPBS) was being advocated for the "soft" human-service areas, and its promoters believed that Title I reports could be analyzed in cost-benefit terms. Results could be fed into Office of Education (USOE) decision-making and then back to the school districts.

In practice, however, a series of evaluation attempts, over seven years, has failed to produce any information that could be used in this fashion. Enforcement by USOE and the states was weak; schools resisted the requirement and complained that evaluations neither fitted

into the school timetable, nor helped them in program planning; and the surveys and token reports produced were utterly lacking in hard data and only rarely read by anyone. Moreover, attempts to conduct in-depth analyses of small numbers of programs showed how difficult it is for most school districts to measure change and program impact, or even trace how and where funds are spent.

B. Goals of Compensatory Legislation

The target population of compensatory programs is, and must remain, politically defined, the result of judgments about who most deserves help, but also of Congressmen's desire to get money for their own districts and of decisions by the appropriations committees. However, if it had been possible to identify unambiguously successful programs and teaching techniques, the remaining Title I provisions would now be fairly uncontroversial and easy to write. Legislation and guidelines would be concerned less with value judgments about how money should be used than with designing a management system through which mandated programs could be established in the schools.

Instead, legislators, administrators and school authorities must make a series of "second-best" decisions about what types of expenditure should be permitted or actively encouraged, without having much clear evidence to determine or support their choice. Of course, they still face, in addition, the basic tasks of establishing administrative machinery and enforcement procedures, and of deciding which children

deserve additional educational expenditures and how to divide the money among them.

This situation tends to produce somewhat fragmented legislation, and guidelines, and considerable disagreement on specific points. For example, the 1974 Amendments reflect dissatisfaction with some aspects of Title I administration, and with the information available about the program. By encouraging individualized instruction and, above all, by introducing a new allocation formula which reduces the amount going to certain cities,[3/] the Amendments reflect the influence of H.R. 5163, the Bill which would have made Title I allocations a function of educational achievement test scores, rather than of poverty and welfare measures. H.R. 5163 also proposed that "for each child there should be developed, maintained and periodically evaluated, an individualized written educational plan," and "that not less than 85% of the expenditure for any program...be attributable to efforts to improve the basic cognitive skills of participating children in reading and mathematics." (Part C, Sec. 131(a), (3) and (4).) The problems of designing compensatory education programs are reflected in the fact that many educators and legislators are concerned about the effects of changes in allocation formulae, the degree to which the Government might limit schools' freedom, and the stress on individualized plans.

These contrasts are not simply a function of political allegiances or degrees of concern for low-income children. They reflect, instead,

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3/ See Chapter II below.

differences in the conception and anticipated role of compensatory programs which date back to the passage of ESEA. For that reason, it is important to enumerate clearly the purposes for which compensatory programs have been designed or advocated and, when discussing research or administrative changes, to show how these relate to program goals.

Resource Distribution and Equity

A first and major concern in formulating and planning compensatory education programs is that of equity. Title I has always been intended to provide disadvantaged children with their "fair share" of national expenditures on education, and a basic assumption underlying it is that, without a federal program, equitable treatment of these children is unlikely. However, as is commonly the case with questions of justice, concrete policy implications do not follow immediately. The target group itself must be identified; the question of whether additional funds are supposed to raise expenditures to or above an existing standard must be decided, the standard determined and the formula set which decides where the money goes and from whose pockets it derives.

In considering problems of equity, this paper will focus on the criteria used in the distribution of resources. Originally, Title I funds were considered to be a way of providing additional resources to children in poor areas, as part of a strategy for alleviating poverty through education. However, since the main concern of program advocates seems to have been that all children should attain at least some minimum

standard of performance, funds were targeted specifically to low-achieving children within these schools.

Many people believe that compensatory funds should continue to go to low-income areas because these areas tend to have concentrations of low-achieving students and, therefore, special problems. Moreover, they frequently have fewer resources than other areas, and many are high-density urban districts where both educational costs, especially teachers' salaries, and the costs of providing other services, are higher than elsewhere.

Others, however, believe that Title I should not be designed as a poverty program, but rather as a means of assisting low-achieving children, regardless of their families' income or the average income of the school's attendance area. They argue that schools and school districts should receive money on the basis of their numbers of low-achieving pupils and that the money should be spent on all these children. It is also suggested by advocates of this approach that, if Title I is perceived as a program addressing the educational needs of all children who are failing, rather than as a program directed at the poor, it will have wider support and will therefore be funded at higher levels and be able to assist more children.

Measures of district poverty and pupils' individual achievement scores are the two criteria generally suggested for use in distributing resources. The chapter on resource distribution will therefore focus on these, on the questions they raise concerning costs, feasibility,

etc., and on whether and how they might be considered in the context of schools' overall resources. However, it should be pointed out that they are not, logically, the only possible alternatives. As formulated, they differ both in the unit on which data is collected - district or child - and in the handicap on which they focus. Thus, instead of allocating funds by district income or individuals' test scores, one could also decide to target money to all children whose families' incomes fall below a certain level, or to all districts whose average test scores are low.

Categorical Aid and the Use of Federal Funds as a Lever

In addition to determining how much money goes to different jurisdictions, Title I legislation and guidelines have always tried to limit strictly the uses which could be made of the money. The way education authorities spend their funds is controlled, for example, by provisions demanding that they concentrate money on areas of greatest need, or that they spend funds only for specific programs directed toward Title I children.

Guidelines of this type tend, of course, to have implications for school organization over and above their immediate concerns. Often, these are unforeseen and undesigned, but sometimes it is fully intended that regulations should act as levers in this fashion. For example, in describing Title I's origins, we mentioned Robert Kennedy's belief that evaluation requirements would provide parents with the

information necessary to ensure that Title I funds were used appropriately. Chapter III below describes certain legislative provisions that affect the way money is spent by school authorities, some problems in implementing these provisions, and their effects on school organization.

The Effects of Compensatory Programs on Children

The justification for compensatory education programs is not, ultimately, that children from low-income districts have more money spent on them, but that they are getting a better education than before. Thus, additional funds and the enforcement of administrative guidelines are seen as preconditions of equal educational opportunity, not as its defining characteristics. Despite limited success to date, therefore, it is important to continue analyzing existing educational approaches and techniques, and developing new programs. Even if we can never mandate any very specific programs, we may be able to identify general factors which increase the likelihood of success, and also provide information to help schools and teachers meet their own particular needs.

Obviously enough, what "works" is going to depend on what a program's objectives are. There has been an increasing tendency in compensatory education to focus on test scores in reading and math. However, the original conception of compensatory education programs, and the purposes for which funds continue to be used are both far broader, and the justification for and feasibility of adopting more general goals should also be considered. Our final chapter, therefore, describes the program goals that school authorities and legislators might consider appropriate, as well as current evidence on which types of compensatory programs are effective in achieving these goals.

II. RESOURCE DISTRIBUTION

This section describes certain issues related to the distribution of funds from the Federal Government to state and local districts. It focuses on the alternative criteria which might be used in deciding which jurisdictions receive money, rather than on the ways in which funds are used or their effect on child development.

In the discussion below, we consider the following topics: (a) Assessing fiscal need; and (b) Implications of alternative procedures for distributing funds.

A. Assessing Fiscal Need

Whatever basic criterion is chosen for distributing compensatory resources, the jurisdictions concerned will differ in their degree of fiscal need--i.e., in how much money they require to pay for education services. Although we cannot construct education production functions for different levels of achievement, clear differences exist between districts both in the type of services needed by students, and in local living costs, which in turn affect teachers' salaries, construction and maintenance expenses, etc. The income available to schools also varies, and depends on the local property tax base, local tax effort, and the costs of providing other public services, as well as on funding from federal and state sources.

For this reason, researchers such as Porter (1973) and Moynihan (1970) have pointed out the importance of studying and reforming the distribution of educational resources in general rather than focusing on one individual program. Compensatory education funds never represent more than a small portion of a school's budget, and the equity of different formulae for distributing Title I funds should therefore be considered within the overall framework of a jurisdiction's resources and needs.

Various studies have been conducted to determine how state and national educational resources are distributed among jurisdictions (e.g., Berke & Kirst, 1972). However, an adequate description of resource distribution and its relation to fiscal need is complicated by the changing nature of the problem. As a result of school finance decisions, some states are implementing plans to equalize expenditures and reduce the number of income sources. Various methods of accomplishing this objective have been suggested which, in general, involve increased federal and state support for education and the coordination of federal grants.

These proposals, if adopted, could significantly affect the distribution of educational resources and therefore school districts' options for implementing compensatory programs. They would also mean, however, that recent work on fiscal need would have to be revised completely. Another fundamental problem is the lack of any clear formula for translating the special problems of educationally

disadvantaged children into costs. Finally, measures of income, needs, etc., used in data analyses are rarely collected frequently enough to be current at the time of the data analysis. For all these reasons, we have incomplete information at present on the extent or locus of fiscal need.

B. Implications of Alternative Procedures for Distributing Funds

Eligibility Criteria

The eligibility criteria that are selected for distributing compensatory funds will, of course, determine which jurisdictions receive the money. Analyses have been conducted to compare the effects of using poverty or educational criteria (e.g., Guthrie and Frentz, 1973). These involve a complex series of calculations using alternative definitions and cutoff points for each criterion. The impact of selecting poverty or educational criteria depends on the definitions selected, and either criterion could be defined so as to result in a similar pattern of distribution of a given amount of money. The issues associated with these criteria are summarized below:

Poverty Criteria. Three issues are of primary concern: (a) Defining and measuring poverty; (b) assessing local needs and costs; and (c) links to other federal and state grants.

The way in which poverty is defined and the particular cutoff point used has a significant effect on the distribution of resources. At present, children are considered poor for purposes of distributing

funds to states and counties if their family income is below $2000, or if they receive AFDC payments. However, the 1974 Education Amendments define eligibility using the Orshansky Index of poverty, which is an adjusted income measure based on number of children in the family, family size, and place of residence (farm or non-farm). In addition, a proportion of AFDC recipients with incomes above the poverty level are also considered poor for purposes of fund distribution. The effect of these amendments is to reduce the relative weight of AFDC counts and thereby to reduce the proportion of funds to certain states with large urban concentrations, while distributing Title I funds more equally throughout the country. Decisions as to appropriate measures of poverty are complicated by the difficulty of obtaining timely and accurate measures. AFDC counts are usually easier to collect and more current than other poverty measures and, therefore, have been a major factor to date in determining eligibility.

A second consideration in determining eligibility is the extent to which varying local needs and costs should be included. For example, the distribution of resources might be made on the basis of a single, nation-wide criterion or, alternatively, could consider such factors as costs of living and of education. Current measures of poverty, whether they are based on unadjusted income measures or the Orshansky Index, do not include real cost of living differences. Although the Orshansky Index differentiates between farm and non-farm residence in defining poverty, it does not consider the range of other

factors contributing to living costs. For example, food costs are used in the computation, while other costs such as housing, which are significantly higher in certain areas, are not considered. Similarly, though state per pupil educational expenditures are considered in assessing the amount of the payment, these are only a very rough indicator of varying educational needs and costs. Therefore, measures are required which take into account real cost of living differences, as well as differences in educational costs in different parts of the country.

Finally, the relationship between Title I allocation procedures and those of other federal and state grants should be considered. At present, these procedures are frequently inconsistent in their resource distribution goals and eligibility criteria. For this reason, a needs assessment should consider how much is available from other federal and state grants, and under what criteria. The possibility of coordinating grants, and of conducting assessments which can be used in formulating more consistent eligibility criteria across grants, might also be studied.

Educational Criteria. Issues to be considered include: (a) assessing educational "need"; (b) availability of achievement measures; (c) costs and administrative feasibility; (d) performance incentives; and (e) possible effects on curriculum development. Although only the first issue is related directly to which jurisdictions

receive money, each of the others is relevant when considering the use of educational criteria to distribute resources.

It is difficult to determine from present information precisely which jurisdictions would gain and which would lose funds if educational performance criteria were used. This depends in part on the distribution of specific educational needs within the United States. We have at present only limited information on these needs, though some data exist from current surveys (e.g., USOE's Consolidated Program Information Report (CPIR), state testing programs, etc.). An accurate estimate of fund distribution would also depend on the definition of educational need, which is in practice a question of the test selected and the cutoff point applied. Preliminary data are available which suggest that large urban school districts tend to lose funds when performance criteria are substituted for poverty indices; these districts tend to benefit as the percentile cutoff point for test scores is increased (Guthrie and Frentz, 1973). However, more information is needed regarding the distribution of achievement scores within the United States, specific tests that could be used, etc., before firm conclusions are possible.

The desirability of using educational achievement criteria for allocating resources depends in part on the availability of appropriate measures. Studies of alternative test batteries are therefore required, including those used for national and state assessment. It would seem most useful to select criterion-referenced or domain-referenced tests that are appropriate both for large-scale assessment, and for indivi-

dual diagnosis and curriculum planning. Where necessary, further work in developing appropriate achievement measures should be considered.

The use of educational eligibility criteria would also have an impact on costs and administrative feasibility. Although estimates have been made of the costs of administering nationwide tests to determine eligibility, these estimates differ widely, and clearer definitions are needed of what test administration involves. The political and practical feasibility of conducting a nationwide testing program at frequent intervals also needs to be considered. School districts are usually comfortable about administering tests of their own choice; however, their reaction to the introduction of a compulsory national assessment, particularly when that assessment determines funding levels, needs to be considered. Finally, problems in collecting, analyzing and applying results of testing programs in a timely manner would be at least as complex as those encountered in measuring poverty.

Concern also has been expressed that using educational eligibility criteria might have a negative impact on the performance incentives of school administrators, teachers and students. Some proposals to base fund allocation on test results appear to include negative incentives, since improvements in performance would, by definition, decrease funds available to the districts, schools, and even students demonstrating test score gains. There are no direct research data available to indicate the effects of this negative incentive on school performance.

Finally, with respect to curriculum, the particular criteria that are used for transferring resources might have a long-term impact on

the type of program developed by schools. The material developed by any national assessment instrument is likely to become part of the school curriculum. If the test questions represent skills that are meaningful for the child's educational development, this outcome could be useful. However, there is also a danger that they might result in an emphasis on trivial facts, in educational uniformity, or in reduced interest in broader cognitive and social goals.

III. CATEGORICAL AID AND SCHOOL ORGANIZATION

In the previous chapter, we discussed ways of deciding how much money a jurisdiction should be given. Here, our concern is rather with how that money is to be spent once the school authorities have in fact received it. As befits a program of categorical aid, Title I legislation and guidelines contain numerous limitations on school authorities' spending, many of which, however, have been enforced with neither enthusiasm nor much success.

Regulations can focus on three levels: on schools, on programs, and on children; and their subject may range from administrative details to judgments about what type of program is desirable. They attempt to determine where an education agency may spend its allocation, and how it is to divide the money between schools; and introduce ways of checking that it is being used in a compensatory fashion -- i.e., as additional funds over and above regular expenditures. Here we discuss, for each level in turn, the more important among existing and proposed guidelines and their implications for school organization and general policy. We then describe the provisions made for enforcing these requirements, and the reasons for their limited success.

A. Targeting to Schools

Current Title I legislation and guidelines attempt to limit fairly strictly the uses to which school districts can put federal compensatory

funds. For example, they specify which schools should receive money when the program is fully funded, which should at other times and how Title I allocations should be related to other sources of income. The basic legislation defines eligible schools as those whose attendance areas contain at least as many or as high a percentage of low-income children as the district average.[1/] Not all such schools need be funded, but important guidelines concerned with "comparability," with "concentration," and with private schools are intended to limit further a district's freedom of choice.

Comparability and Multiple Sources of Funding

Title I funds are intended to be additional compensatory funds, not to replace local resources, but it is extremely difficult to find out whether or not this is in fact happening. The problem has been defined by David Porter (1973) in terms of "multipocket budgeting." When an organization has various sources of income, each with different numbers of restrictions attached to its use, it is relatively easy for administrators to implement successfully their own priorities and wishes, rather than allowing those supplying the resources to impose theirs. The revenues with the most restrictions on their use may be obligated first and, since they are extremely unlikely to be reserved

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1/ See Appendix B below. The 1974 Amendments, in response to widespread busing, extend eligibility to schools whose "operational" attendance areas--the areas from which pupils actually come to the school--meet this criterion.

for purposes entirely outside a school district's normal and existing concerns, can often fund items in the regular program. This leaves general purpose funds--for example, those raised from the local tax base--free for use in areas which are of local interest. In such a situation, it is extremely difficult to know whether a new program--for example, Title I--has resulted in "symbolic allocation," where it replaces local funds that would otherwise have been spent in this area; in "catalytic allocation," where it acts as a pump primer, stimulating further local expenditures; or in "perfect allocation," that is, in the funds being added onto existing programs without either diminution or additions. The administrators concerned may not know themselves.

Comparability requirements were introduced in order to tackle this situation. They were in large part a response to the publicity given to the fund abuses of Title I's early years,[2/] and require that the average non-Title I expenditures in each Title I school be precisely comparable to the average expenditures in non-Title I schools in the same district. These expenditures are to be calculated on three well-defined measures and for corresponding grade levels.

The major advantage of existing comparability guidelines is that they provide a well-defined standard against which school districts' practices can be measured and, if enforced, would ensure that Title I

2/ The older supplanting provision was too imprecise for easy enforcement and stated merely that: "Title I funds...are not to be used to supplant state and local funds which are already being expended in those areas if the services in those areas were comparable to those for non-project areas." (Program Guide #44, Sec. 7.1).

money was not simply used as general aid. They may also provide a stimulus for budgetary change and improved accounting procedures. Their introduction revealed that many local education agencies (LEAs) had little clear picture of where money was going; some still can give only estimates of expenditure-per-building, and per-pupil budgeting is extremely rare. To those who believe in the possibility and desirability of evaluation and cost-effectiveness in administration, this is a targeting spin off worth consideration.

On the other hand, current guidelines may encourage LEAs to keep expenditures low in some non-Title I schools and to choose for Title I funding those eligible schools with relatively high incomes. In this way, they can keep the non-Title I average low. The guidelines may also have deterred school districts from concentrating their other funds. Prior to the 1974 Education Amendments, comparability requirements did not allow districts to "count out" of their calculations expenditures derived from state compensatory programs and other special funds. Thus, a district which for reasons of space and efficiency concentrated state compensatory funds in some non-Title I schools, or "Teaching English as a Second Language" programs in others, might as a direct result find itself failing to comply with comparability guidelines.[3/]

3/ Current regulations allow districts to discount these special funds provided that all eligible children are served equally by them.

Concentration

Concentration guidelines are intended to decide which schools from among the eligible group actually get funds, and result largely from ESEA's continual underfunding. Throughout the history of federal compensatory programs, the assumption has been that a certain critical amount of money per pupil is required if anything is to be achieved, and that in addition, a school should receive enough money to enable it to develop a special program. Spreading the money thin has been seen as ineffectual, and an inappropriate response to reduced allocations.

Federal guidelines therefore encourage concentration of funds on a few schools from among those eligible and also attempt to influence which schools are chosen from within the eligible group. The precise requirements are that payments be for "educationally deprived children in school attendance areas having high concentrations of children from low-income families," (20 U.S.C. 241). However, although some states have introduced strict concentration requirements for the use of Title I funds, the only clear federal directive is one stating that expenditures per child in compensatory programs "should be expected to equal about one-half that from state and local sources."[4/]

4/ In conjunction with comparability requirements, this implies fairly precise levels of expenditure.

Until the passing of the 1974 Education Amendments, schools whose own attendance areas were not eligible, but whose classes included children bused in from eligible areas, could not receive Title I funds. Moreover, concentration guidelines continue to pose problems for districts whose schools are well integrated economically, and whose poor families are not concentrated in certain residental areas.

Private Schools

Within the public school system, the amount of money a county receives follows automatically from the legislative formula and the appropriation decisions of Congress. Where private schools are concerned, however, regulations are needed to ensure that eligible children in this sector receive any money at all.

Title I funds have always been intended to reach eligible pupils in non-public schools, as well as in public ones. Theoretically, services are supplied on the basis of residence in a Title I attendance area, and then on student educational need. However, the amount of Title I money which actually reaches non-public school students is not great. Many local education authorities are, understandably, eager to minimize the amount of money leaving the public system, while others do not believe that private--particularly parochial--schools should receive public funds. Missouri, for example, claimed that its constitution prohibits the channelling of money to the non-public sector. This position was challenged and in June 1974, the United States Supreme Court ruled in the private schools' favor. Elsewhere,

problems of logistics and data collection block the flow of aid. In addition, USOE guidelines are not adequately specific concerning responsibilities and requirements in this area. As a result of this often minimal participation, and of the protests of non-public school personnel, the 1974 Amendments provide for the bypassing of school districts where necessary and for the provision of services to non-public schools through arrangements made by the Commissioner.

Given the increasing tendency of inner-city Catholic schools to serve ghetto children (often non-Catholic), the possibility of receiving substantial Title I funds is of enormous potential importance to these schools--and to the future of non-public schools in city areas. However, as a result of recent Supreme Court decisions outlawing both direct financial aid to parochial schools and state payment of their teachers' salaries, it is not clear whether and how funding increases can, in fact, be administered other than through programs run by the school district. It may be, for example, that any plan involving the regular classroom teacher of a child in a sectarian school is impossible, and that what is implied, for those states which permit it, is a large increase in dual enrollment arrangements.

B. Targeting to Programs

If the original objectives of compensatory education advocates had been realized, the guidelines governing programs would be the most important of all. Through them, LEAs would be instructed to establish

the type of programs which evaluations had identified as clearly effective. However, the failure to locate successful projects by this method has left it unclear how program guidelines should be written.

The Argument for Separate Programs

Title I legislation has always required that a school's funds be used for a special, identifiably separate program open only to Title I children. The assumption was that it was pointless simply to add money to classrooms in which children were currently learning little, and that establishing a separate program would encourage those involved to rethink their methods and techniques and be more innovative. However, this requirement may also have some far less desirable consequences. There is some evidence that it has promoted de facto segregation (by race and class) in Title I schools and that children in the program are placed in what is effectively a separate low-status stream (Wargo, 1972). The provision may also reduce the likelihood that Title I funds and programs act as pump primers in the sense of stimulating change throughout the school. However innovative and successful Title I teachers may be, if they remain within the closed walls of the Title I classroom they are unlikely to have much impact on the school as a whole.

The Level of Decision-Making

Responsibility for Title I programs is currently the district's; it submits plans to the states, and sends teachers and equipment to the individual school. Although the staff and principal of each school

may choose to integrate their own program with Title I activities, they have no responsibility for initiating and controlling these activities, which exist as a totally separate unit.

This arrangement has been criticized frequently. It is, for example, quite different from that adopted by Right-to-Read. The latter is avowedly school rather than district-based and has school principals planning and assuming responsibility for programs. Studies of programs which were relatively successful in reaching their achievement goals emphasize the importance of having detailed objectives, working out sequential curricula, and using individualized teaching techniques, and so imply direct and continuing teacher involvement in planning.

Even if we were able to suggest specific instructional approaches, guidelines which encourage teacher involvement might be extremely important. Currently, they may be one of the most effective ways to approach program targeting, especially if we also want to influence regular classroom practices.

Evaluation

Title I requirements include a demand that districts evaluate their own programs and that states monitor districts' activities. At the time of Title I's inception, the evaluations were expected to produce data for analysis in a Program Planning and Budgeting System (PPBS). Results would be fed back to the schools and thus increase educational cost-effectiveness.

However, both compliance and the quality of evaluation results have been poor. In part, this is because the type of detailed work promoted by PPBS advocates is apparently impossible to carry out in a school district. It is extremely expensive, too complex and demanding of skilled personnel for each school system to mount, and also yields relatively little concrete information about program success, let alone educational production functions. Many school systems cannot give accurate information on either program costs or methods, and do not have useable data on how achievement scores have altered over time. Moreover, the current procedures are analogous to asking students to set and grade their own exams. The Office of Education's Division of Compensatory Education, administering a program where it has no power to make discretionary grants, is expected to provide the technical assistance needed to establish successful programs, as well as monitor and evaluate the latter. This does not provide a very strong incentive for strict evaluations.

Nonetheless, evaluation requirements can have considerable organizational impact. In the Alum Rock Voucher Project, the establishment of an evaluation process for voucher schools has resulted in the superintendent establishing, for the first time, a district-wide needs assessment and evaluation program. A clear directive to all Title I schools to, for example, conduct before-and-after yearly testing, and provide basic information on the results and nature of their program might, if enforced, affect school planning and responsiveness to parents.

C. Targeting to Children

Eligibility

At present, children are selected to participate in a compensatory program on the basis of educational disadvantage, and this process may often segregate them from their peers. However, the procedures by which selection takes place are neither very clear nor very well understood. Guidelines declare only that school districts must "evaluate the evidence concerning the educational needs of the children who live in eligible attendance areas."[5/] How often these evaluations are to be carried out, and with what precise content, is not specified. As a result, we know very little about the exact academic weaknesses, needs, past performance and family background of the children served; about how they compare with their peers, or are selected for program participation; and about how selection procedures vary with or affect the type of Title I program adopted.

Delivery of Services

Title I funds are intended to provide services over and above those provided by the general curriculum. At the level not only of the school, but also of the child, maximal concentration of funds may be desirable as the best way of getting all children to at least a minimum standard of achievement.

5/ USOE Program Guide #44 (2.1), p. 4.

However, this may be difficult to achieve. First, per-pupil budgeting is extraordinarily rare. Second, most school expenditure is on teacher salaries. Unless Title I teachers always double up with regular classroom staff, a child participating in Title I "loses" resources every time he is out of the regular classroom. By the same token, his classmates "benefit" from lower staff/child ratios.

One approach would be to set aside a certain dollar amount per child, to be spent on him and accounted for as a separate expenditure. In addition to safeguarding the compensatory nature of the program at the child level, such an approach would have significant organizational implications. Its proponents see it as ensuring that the money is spent on projects directly responsive to each child's needs, both because it focuses attention on the individual pupil and because of the visibility of expenditure decisions. This type of targeting would make it much easier for parents to see how their children's entitlement was being used and, it is argued, thus increase school responsiveness to its clientele. The considerable decentralization of Title I planning which it would involve is also cited as an advantage of targeting funds directly to pupils.

The administrative complexity of such an approach, however, is considerable. The paperwork required to allocate and deliver funds would be increased, and a per-pupil budgeting system would be a necessity if children moving during the school year were to receive their entitlements. Moreover, the likely effects on the child's

regular school program are unclear. Decentralized planning might increase the impact of Title I funds within the school; on the other hand, greater use of outside tutoring and diagnostic centers might be the major change evident, with the schools remaining much as before.

D. Enforcement

Guidelines are, obviously enough, effective only when enforced, and, as was pointed out above, enforcement has been the exception, not the rule. For example, the Lawyers' Committee for Civil Rights under Law has charted the enormously high level of non-compliance with comparability requirements, even when based on districts' own figures. However, one advantage of these requirements is that compliance is well defined and relatively easy to check, and the position here does seem to be improving. Philadelphia's loss of its Title I entitlement because of guideline violations which included, prominently, violation of comparability requirements, will probably give many LEAs an incentive to comply which they lacked under previous policies of non-enforcement. In other cases, guidelines are so vague as to be almost unenforceable.

USOE is, for political reasons, unwilling and unable to tangle with state and local education authorities; and the states, with whom responsibility for policing the districts rests, have been equally, if not more, unwilling to act. In part, this is because current legislation gives them very little effective power. Either they accept

a district's plan and report and give it its predetermined allotment, or they deny it any funds at all on the basis of guideline violations. If states were able to respond to violations in a graduated manner instead of cutting off all funds or none, and if they could offer some incentives to districts, in the form, say, of bonuses with which to expand good programs, they might be better able to police the Title I program.

One possible approach to enforcement remains the use of parent councils. During the early years of Title I, reformers believed these to be vital both to the program's own effectiveness and to its general influence on education. Present legislation mandates a Parental Advisory Council (PAC) for both districts and schools, on which over 50% of the members must be parents of educationally deprived children in project schools.

The activities and influence of PACs, however, vary enormously. Some states go beyond federal requirements and give them formal sign-off authority on important project activities. In other cases, there is no evidence that PACs are being consulted and informed; and many councils take no real part in the program.

Few people now see parental participation as a magic carpet to effective schooling. However, many "exemplary programs" do include heavy parent involvement, and parent councils which have more than token existence may be worth encouraging. They can provide a base for home-school contacts, for increased parental knowledge and influence, and for increased school responsiveness to parental wishes.

Even if they have no apparent effects on educational quality, they may be desirable simply because of parents' right to have some control over their children's education.

IV. EFFECTS OF COMPENSATORY PROGRAMS ON CHILDREN

Although the way in which compensatory funds are used by school authorities can be evaluated in terms of the effects on school organization, the ultimate value of both organizational changes and of compensatory funds themselves rests on their contribution to children's development. Our knowledge of what makes educational programs most effective in promoting such development is, unfortunately, limited and sometimes inconsistent, though some preliminary findings cited in Sections B and C below have emerged from recent research.

The difficulty of evaluating compensatory programs is compounded by the diversity of their objectives. Title I funds have been used for a wide variety of purposes ranging from reading, math and science programs to health and nutrition services, counselling, expenditures for general cultural enrichment, and purchases of new equipment. The question of which of these is most appropriate for Title I expenditures is, of course, a value judgment that can usefully be considered only in the context of overall national priorities. No research project can compare the effectiveness of a health program with that of a math or reading program. Therefore, this section focuses on the goal which is increasingly central to Title I legislation--enhancing children's cognitive development.

In the discussion below, we consider two aspects of cognitive development: first, school achievement, particularly in reading and math; and second, more general cognitive development.[1/] There has been some ambiguity in Title I legislation as to the relative emphasis that should be placed on narrow achievement goals, but the trend has been to emphasize achievement in basic skills rather than more general child development. This trend is based on an assumption that it is simpler to determine the existence of a reading or math program and to assess its effects than to attempt evaluations of less specific expenditures, and that funds spent on reading and math are more likely to produce concrete results. Funds directed toward more general cognitive goals or spent on programs designed to affect the child's "mental health" can easily become, in effect, general aid. However, there has been some ambivalence about excluding other options

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1/ Programs with achievement goals typically include detailed curricula in specified subject matter areas, e.g., language, reading or math. The programs are designed to teach facts, and are not designed to teach strategies that transfer to different learning requirements. Programs with general cognitive goals typically emphasize conceptualization, problem solving, reasoning or divergent thinking. The achievement of these goals is assumed to be directly related to a subsequent ability to handle complex learning tasks. The purpose is to provide learning strategies which children can use in a variety of learning situations. Although achievement and general cognitive goals are frequently included within the same program, programs differ substantially in their emphasis. In addition, both types of programs might be designed to affect the child's personality or social development, because these objectives are considered important in themselves and also because they are frequently assumed to be related to cognitive performance.

because of concern that broader areas of child development might thereby be ignored.

Past research on compensatory programs is described below. Four topics are addressed: (a) Program Goals and Operating Characteristics; (b) Title I Evaluations; (c) Evaluations of Other Compensatory Programs; and (d) Methodological Constraints.

A. Program Goals and Operating Characteristics

We have little information concerning the nature of the programs funded by Title I. Only general descriptions of the incidence and distribution of various types of programs are available, and we have almost no knowledge of the operating characteristics of particular programs. As a result, achievement test scores of Title I children have been evaluated without the evaluators knowing in what type of program these children were participating, what its goals and teaching procedures were, or even whether a program existed at all. Reading and math scores have been used in assessing programs which were in fact providing health services, general cultural enrichment, or funds for purchasing new projectors. Although the frequency of each program type is not known, there is evidence that Title I funds often have been used for fragmented programs, new equipment, and after hours or summer programs rather than for core curricula that might have a more direct effect on student achievement. Even where school reports have indicated that Title I teachers were hired to give compensatory reading instruction, there is typically no information on the teaching

procedures used, on the particular children reached, or on whether the actual amount of reading instruction increased for Title I children after the new teacher was hired.

This paucity of information is not restricted to Title I research but has been a consistent problem in many studies of this type, such as evaluations of Head Start and of state compensatory programs. In general, program goals have not been specified, teaching procedures are unknown, and there frequently is little in common between the child's experience in the program and the measures used to assess performance. In the discussion of research findings below, it is apparent that programs demonstrating measurable success in most instances had clearly defined objectives and used outcome measures that paralleled them. Although this finding is intuitively obvious, it has frequently been ignored in designing and evaluating compensatory programs.

B. Title I Evaluations

There are a number of reasons why Title I evaluations have failed to provide much useful information about program design. As mentioned above, the type of programs funded and the operating characteristics of these programs are usually left unspecified, while the effectiveness of the programs themselves may often be reduced by short planning time and high teacher and student turnover. In addition, although Title I programs are by law required to provide additional resources to target schools, there is evidence that until recently there were almost no school districts in which schools were

comparable before Title I funding. Therefore, evaluations have frequently looked for gains by Title I students when in fact these students were not receiving more resources than the students with whom they were being compared.

Given these constraints, it is not surprising that national evaluations typically have not found achievement gains for Title I students. Local evaluations, which at times do indicate improved test scores, are usually difficult to interpret because of methodological uncertainties, such as unspecified sampling techniques, lack of pre-tests, etc.

Studies of exemplary programs (Wargo et al, 1971; 1972) have provided somewhat more information. These studies have indicated that successful programs generally include several of the following factors: (a) objectives and planning; (b) teacher training; (c) high intensity instruction; (d) parent involvement; (e) individualized instruction; (f) structured environment; and (e) instruction which is relevant to the outcome measures used. In addition, a large proportion of the successful programs provided extra remedial reading services. This result is supported in a study by Kiesling (1971) which indicated that time spent on instruction, especially by trained reading specialists, was consistently related to reading gains. Follow-ups of exemplary programs are ambiguous. A substantial proportion of the programs could not provide evalution data or had changed so much that a follow-up was not meaningful. Of the 14

remaining programs, 9 indicated some success on the follow-up study.[2/]

C. Evaluations of Other Compensatory Programs

Studies of other compensatory programs indicate that participating students sometimes achieve short-term test score gains, but the differences between experimental and control children tend to be temporary. Most studies do not provide information on instructional techniques, but results from those designed to look more closely at program procedures are consistent with the "exemplary" program research described in the previous section. These latter studies indicate that clearly identified achievement goals can be reached most effectively when (a) academic goals are specified for teachers and students; (b) a detailed sequential curriculum is presented to students; and (c) the instruction is individualized using drill, child response, and contingent reinforcement. Although there are exceptions and inconsistencies in the data, these classroom procedures appear to have been most successful in teaching specific skills and facts.[3/]

2/ A study funded by the Office of Education (Ruben et al, 1973) is presently analyzing in more detail educational variables associated with successful and unsuccessful federal and state compensatory reading programs. A range of variables (e.g., amount of time spent on reading, use of tutoring, student turnover, etc.) derived from on-site observation are included in the study.

3/ These conclusions are based on reviews of preschool and elementary school studies by Stearns (1971), Bronfenbrenner (1972), and White (1972) and on the Head Start Planned Variation (Smith, 1973; Weisberg, 1973) and Follow Through (ABT, 1973; Soar and Soar, 1972; Stallings, 1973) studies.

Although this research indicates some general principles that might be useful in developing curricula designed to teach specific reading and math skills, there is no evidence that the learning achieved in highly structured programs transfers to other tasks. For this reason, compensatory programs sometimes stress more general cognitive development in the expectation that if children can conceptualize, reason, or solve problems effectively, and if they are encouraged to acquire positive attitudes towards and to assume responsibility for learning, these abilities will transfer to subsequent school requirements regardless of the subject matter involved.

Some tentative results do suggest that more abstract cognitive development is related to instructional emphasis on how to learn rather than on specific content areas, and several programs have been developed with some success. For example, some programs with general cognitive objectives have used methods typical of successful achievement programs--i.e., structured curricula, individualized instruction, and frequent reinforcement--to teach children strategies for learning. In contrast, other general cognitive programs have encouraged considerably less teacher direction on the hypothesis that children could thereby learn to think more flexibly and creatively.[4/]

4/ See, for example, Soar and Soar, 1972; Rowe, 1973; A Process Approach to Science developed by the American Association for the Advancement of Science, 1967, 1967, 1970; Van De Riet and Resnick, 1973; and Blank, 1973.

D. Methodological Constraints

Although this brief survey indicates that some information on program effectiveness has been acquired in recent years, it also points up how sparse the findings are in relation to the amount of effort and talent expended. We still know relatively little about which educational programs are most effective, or about the impact of particular instructional techniques. The situation is primarily the result of rather severe methodological constraints in conducting this type of research. It is difficult to implement programs as originally planned, and to measure their effects.

Informal appraisals of the Follow Through and Planned Variation studies where sponsor control over various sites has been relatively strong, indicate that operating programs frequently appear to casual observers to be quite different from the theoretical models from which they were derived. However, observational measures are not yet adequately developed to assess the extent of these differences, to determine whether the differences are educationally significant, or to identify which instructional techniques are most difficult to replicate. Although attempts have been made to assess implementation systematically (Soar and Soar, 1972; Stallings, 1973), these procedures have had only limited results. Thus, a finding of "no difference" between programs could indicate that the programs in fact were not implemented as planned or, alternatively, that the varying instructional models represented by different programs were simply not differentially related to child development.

A second major obstacle is the difficulty of assessing children's performance. Even in the measurement of academic skills, where test techniques are relatively well developed, measures of program effectiveness have frequently been inappropriate. Programs are typically evaluated using national norm-referenced tests which are not designed to identify and discriminate among different skills within a subject area. However, criterion-referenced tests which are more appropriate for comparing different educational procedures, are not yet well developed technically. There are problems in comparing various programs for which different tests have been designed, and in deciding what amount of improvement as measured by a criterion-referenced measure constitutes success for a program. The obstacles to charting other aspects of child development--in particular, social or emotional development--are even more serious. These areas cannot be measured adequately because there is no agreement on what types of behavior are associated with various stages of development. It is difficult, for example, to describe self-concept or motivation operationally because behaviors which define these constructs have not been specified. Thus, many highly valued aspects of child development cannot satisfactorily be measured in program evaluations.

Finally, the tests used to measure program effectiveness are frequently irrelevant to the program goals and instructional procedures used. The most obvious examples, of course, are those in which reading and math test scores have been used to evaluate the effectiveness

of compensatory funds which were in fact being used for purposes (e.g., health or counselling services, general cultural enrichment, etc.) quite unrelated to reading and math achievement. Although this is an illustration of an extreme mismatch between program objectives and outcome measures, measures of program effectiveness are rarely strictly relevant to the objectives of the program. Thus, for example, programs which stress general cognitive development and creativity are often assessed by achievement measures; and, reading programs which emphasize decoding skills may use comprehension measures to evaluate effectiveness.

These methodological problems imply that little information will be acquired from large national evaluations which depend simply on comparisons of outcome measures, without an understanding of the programs or children represented by these measures. Any thorough understanding of the relationship between program characteristics and children's social and emotional development will probably result from long-term theoretical work and basic research in child development and measurement. In the area of academic achievement, however, it may be possible to establish on an empirical basis, by in-depth studies of program characteristics, which educational procedures are generally associated with effective learning.

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APPENDIX A

Public Law 93-380
93rd Congress, H. R. 69
August 21, 1974

An Act

88 STAT. 484

To extend and amend the Elementary and Secondary Education Act of 1965, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Education Amendments of 1974".

Education Amendments of 1974.
20 USC 821 note.

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PART B—EDUCATIONAL STUDIES AND SURVEYS

STUDY OF PURPOSES AND EFFECTIVENESS OF COMPENSATORY EDUCATION PROGRAMS

20 USC 1221e note.

SEC. 821. (a) In addition to the other authorities, responsibilities and duties conferred upon the National Institute of Education (hereinafter referred to as the "Institute") by section 405 of the General Education Provisions Act and notwithstanding the second sentence of subsection (b)(1) of such section 405, the Institute shall undertake a thorough evaluation and study of compensatory education programs, including such programs conducted by States and such programs conducted under title I of the Elementary and Secondary Education Act of 1965. Such study shall include—

86 Stat. 328.
20 USC 1221e.

64 Stat. 1100; 79 Stat. 27; Ante, p. 488.
20 USC 236.

(1) an examination of the fundamental purposes of such programs, and the effectiveness of such programs in attaining such purposes;

(2) an analysis of means to identify accurately the children who have the greatest need for such programs, in keeping with the fundamental purposes thereof;

(3) an analysis of the effectiveness of methods and procedures for meeting the educational needs of children, including the use of individualized written educational plans for children, and programs for training the teachers of children;

(4) an exploration of alternative methods, including the use of procedures to assess educational disadvantage, for distributing funds under such programs to States, to State educational agencies, and to local educational agencies in an equitable and efficient manner, which will accurately reflect current conditions and insure that such funds reach the areas of greatest current need and are effectively used for such areas;

(5) not more than 20 experimental programs, which shall be reasonably geographically representative, to be administered by the Institute, in cases where the Institute determines that such experimental programs are necessary to carry out the purposes of clauses (1) through (4), and the Commissioner of Education is

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authorized, notwithstanding any provision of title I of the Elementary and Secondary Education Act of 1965, at the request of the Institute, to approve the use of grants which educational agencies are eligible to receive under such title I (in cases where the agency eligible for such grant agrees to such use) in order to carry out such experimental programs; and

64 Stat. 1100; 79 Stat. 27; Ante, p. 488. 20 USC 235.

(6) findings and recommendations, including recommendations for changes in such title I or for new legislation, with respect to the matters studied under clauses (1) through (5).

(b) The National Advisory Council on the Education of Disadvantaged Children shall advise the Institute with respect to the design and execution of such study. The Commissioner of Education shall obtain and transmit to the Institute such information as it shall request with respect to programs carried on under title I of the Act.

Information, availability.

(c) The Institute shall make an interim report to the President and to the Congress not later than December 31, 1976, and shall make a final report thereto no later than nine months after the date of submission of such interim report, on the result of its study conducted under this section. Any other provision of law, rule, or regulation to the contrary notwithstanding, such reports shall not be submitted to any review outside of the Institute before their transmittal to the Congress, but the President and the Commissioner of Education may make to the Congress such recommendations with respect to the contents of the reports as each may deem appropriate.

Report to President and Congress.

(d) Sums made available pursuant to section 151(i) of the Elementary and Secondary Education Act of 1965 shall be available to carry out the provisions of this section.

Ante, p. 499.

(e)(1) The Institute shall submit to the Congress, within one hundred and twenty days after the date of the enactment of this Act, a plan for its study to be conducted under this section. The Institute shall have such plan delivered to both Houses on the same day and to each House while it is in session. The Institute shall not commence such study until the first day after the close of the first period of thirty calendar days of continuous session of Congress after the date of the delivery of such plan to the Congress.

Study plan, submittal to Congress.

(2) For purposes of paragraph (1)—

(A) continuity of session is broken only by an adjournment of Congress sine die; and

(B) the days on which either House is not in session because of an adjournment of more than three days to a day certain are excluded in the computation of the thirty-day period.

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APPENDIX B: HOW A GRANT BECOMES A PROJECT UNDER PRESENT TITLE I LAW

The procedures for allocating Title I funds to states, counties within states, school districts within counties, and finally school attendance areas within districts are all different, though generally based on economic criteria. The data base changes to "needs assessment"for the selection of actual Title I project areas and eligible pupils. Appendix B describes the formulae and procedures involved at each level. This seemingly straightforward exercise becomes increasingly complex as funds are followed from county allocations to pupil selection. Surprisingly, rules and regulations are not found in a single publication, but must be pieced together from the legislation (20 USC 241), the federal regulations (45 CFR 116), and various USOE publications such as program guides and handbooks. Further complications include: vague language; overlapping definitions; legislated changes which occur when Title I is not fully funded; and additional requirements found at many state and local levels. A few of these intricacies are touched upon in the descriptions which follow.

Determination of State and County Grants

Title I contains:

- Part A, the basic grant for LEAs and state-operated institutions
- Part B, the special incentive grant
- Part C, the special grant for urban and rural schools with the highest concentrations of children from low-income families

For all three parts, USOE computes the allotted funds for each state and for each county (or the equivalent political subdivision).

Part A formula: Maximum grant = (# eligible children) x (cost factor) [1/]

For purposes of distributing funds to counties and states, two groups of children are eligible:

1. In LEAs, those children aged 5 to 17 in families below the poverty level as defined by the Bureau of the Census in compiling the 1970 Census,[2/] two-thirds of AFDC children whose family incomes are above the current Orshansky Index,[3/] and those children in local institutions for neglected or delinquent children.

2. Children in state-operated institutions and programs for neglected, delinquent, handicapped and migrant children (including children of migrant fishermen as well as migrant agricultural workers).

The cost factor is 40% of the state average per pupil expenditure (APPE), with a floor of 80% and a ceiling of 120% of the national average. APPE is computed by dividing the average number of children in daily attendance into the annual aggregate expenditures of all LEAs in the state plus direct current amounts spent by the state for the operation of LEAs. This computation is done for each state, and also nationally. For any state, its own APPE is used in the formula, unless this figure is greater than 120% or less than 80% of the national per pupil average. In these cases, the appropriate national ceiling or floor is used in place of the state APPE.

1/ The formulae used in this appendix describing Part A, Part B, and Part C are updated forms of those appearing in Clark (1972).

2/ Thus, payments in this part of the formula are based on the 1969 Census count of children in families with incomes below the Orshansky poverty index for that year ($3,750 for a non-farm family of four).

3/ The 1973 Orshansky level is $4,250 for a non-farm family of four.

Part B formula: Maximum grant = $1/eligible child for each 0.01% by which the state effort index exceeds the national effort index

In other words, a state may get added funds if its "state effort index" is larger than the "national effort index."

The state effort index is the ratio of total non-federal expenditures in the state for public elementary and secondary education to the total personal income in the state.

The national effort index is the ratio of total non-federal expenditures in all states to the total personal income in all states.

The 1974 Amendments limit states' entitlements to $50 million.

Part C formula: Maximum grant = (# eligible children) x (50%)(state APPE)

A LEA is eligible for this additional grant if it is located in a county in which:

1. The number of children from families with incomes under $3,000 per year and from families with AFDC incomes over $3,000 per year is twice the state's average of such children; or

2. There are at least 10,000 eligible children (as described above) equalling at least 5% of the total number of children in the county.

Congress has authorized $75 million for Part C, but no state may receive more than 12% of the total national appropriation.

This formula pretains to FY 75 only. The Education Amendments of 1974 automatically repeal Part C on July 1, 1975.

Administrative money:

States receive administrative money to perform their Title I duties. This is 1% of the amount received under Parts A and C combined, or $150,000, whichever is greater. This amount is deducted from LEA grants.

Reduction procedure:

Title I legislation includes procedures by which grants are reduced when the Congressional appropriation is less than total entitlements.

The SEAs Part A grants are paid fully, and no state can receive less than 100% of the preceeding year's allocation. Part A LEA grants and Part B allocations are then ratably reduced, with Part B essentially restricted to an extremely small share of Title I funds.

Although Part A LEA grants are reduced below their entitlement, each state must receive at least some specified minimum (its floor value or hold-harmless level) for its total Part A LEA allotment. If any state's grant is below the floor, its allotment must be brought up by proportionately reducing the allotments to all the other states. As it now stands, the legislation guarantees each state Part A LEA grants equalling 85% of the preceeding year's allocation. In addition, Congress has authorized extra money ($15.7 million) for each fiscal year to be allocated at the discretion of the Commissioner in order to raise LEA's hold-harmless level from 85% to 90%.

Determination of LEA Grants

The regulations for Title I (45 CFR 116.4) specify that the SEA make allotments to the LEAs located within each county. This is done by using data the SEA feels best reflects the current distribution in the county of children from low-income families. The regulations suggest the use of decennial census low-income data augmented with AFDC counts, or AFDC counts alone, or a combination of these with other available data weighted as the SEA deems appropriate.

States, therefore, are given wide latitude in their choice of method and are encouraged to use any better data available in distributing the county aggregate grants among individual local educational agencies.

At present, 28 states use the same data as in the federal formula. Five states use census data only, and eight states use AFDC only. Seven states have counties coterminous with school districts, so require no subcounty allocation, and three states use other combinations of data sources, all using AFDC or census as part of their formulae and all involving school enrollment data in some way.

Determination of Eligible Attendance Areas

Within an LEA, the eligibility of school attendance areas[4/] for Title I projects is primarily determined from data indicating the concentration of children from low-income families. Again, there are two preferred socurces of data--the decennial census and AFDC. Other types of data may be used, however, including health, housing, free lunch, and employment statistics. The selection of data sources and the relative weights assigned are a matter of local prerogative.

Based upon its selected data, the LEA estimates the number of children from low-income families residing in each school attendance area. From these estimates three other estimates are derived:

1. The average number of low-income children per school
2. Low-income children as a percentage of all LEA children
3. The corresponding percentage for each attendance area

Eligible attendance areas are then chosen. Each must have a concentration (either percentage or actual number) of low-income

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4/ A school attendance area is defined as the geographic area served by a public school.

children at least as great as the average concentration (percentage or number) in the LEA.

In the 1974 Amendments, two factors are added to the determination of eligible attendance areas: (1) at the discretion of the LEA, a school serving an ineligible area may be determined eligible if the percent of low-income children in average daily attendance is at least as high as the district-wide average of low-income children, and (2) if an attendance areas is ineligible in the present fiscal year but was eligible in one of the preceeding two years, it can be considered eligible in the present year.

Determination of Project Areas

A project area may be coterminous with a single school or include several schools. Moreover, one school may have several projects. The selection of areas, according to the USOE Handbook (1971), is based upon a "needs assessment." To select project areas, eligible attendance areas are ranked by percentage and/or number of low-income children. The choice of which ranking to use or whether to use both is left to local prerogative. Project areas are selected from either or both lists in rank order, beginning with the highest concentrations. No area may be skipped in favor of a lower-ranked one except by specific permission of the SEA.

If both lists of eligible areas are used, the total number of project areas selected may not be greater than the number which could

have been selected from one list alone. There is, however, one exception. When the difference between the highest and lowest concentrations in a single LEA is "significantly less" than the average such difference for all LEAs in the state, the SEA may approve the entire LEA as a project area.

This "project area" level seems to mark the beginning of imprecise terminology, unclear relationships, and vague delineations of responsibility in Title I documents. There are inconsistencies both within and across various publications. Terms are overlapping and often interchanged in a confusing manner. Examples include (especially within USOE material) the seemingly random use of "selected attendance areas," "target areas," and "project areas." "Attendance areas" and "attendance units" are also used interchangeably. It also is sometimes difficult to relate certain terms to their corresponding counterparts in other Title I material.

The term "needs assessment" is never clearly defined. At times, only economic need is considered. For example, the Handbook (1971) states that project areas be determined by needs assessment and then discusses the selection of eligible areas in rank order according to low-income concentration. Usually, a combination of economic and educational need is implied. Program Guide #44 states that school authorities, parents, and other agencies should give special attention to "educational tests, linguistic or racial isolation, welfare and nutrition, physical and mental handicaps, and other pertinent

information on which the incidence and severity of the needs of children in the project areas can be established" (Sec. 2.1). Sometimes, however, only educational needs assessment is implied. The regulations specify in several sections that projects are to be designed to meet the "special educational needs of educationally deprived children." The guidelines do little to clarify this except state (in some suggestions for improving program quality) that priority groupings of children be identified within the chosen attendance area and "thus further focus the program to certain grade levels or special needs categories" (Guide #48, p. 2).

Therefore, not only is the definition unclear, but also the actual timing, scope and use of needs assessment is not delineated. In several sections, Program Guide #44 discusses needs assessment in all eligible attendance areas. On the other hand, the guide indicates that the purpose of needs assessment is to establish information concerning the needs of children in project areas. Rather than specify when and for what purposes various needs assessments take place, the material simply implies its use in different ways and by different means on at least three "levels:"

1. Selecting project areas from eligible attendance areas
2. Designing projects
3. Selecting participating children

Determination of Projects

A Title I "project" is defined by the federal regulations as "an activity, or a set of activities, proposed by a state or local educational agency or the Department of the Interior and designed to meet certain of the special educational needs of certain educationally deprived children." (45 CFR 116.1 (u)).

The regulations define "program," on the other hand, as "an overall plan with respect to funds made available under Title I of the Act during a fiscal year which is intended to be put into effect by a state or local educational agency or the Department of the Interior through one or more projects." (45 CFR 116.1 (t)).

There is great latitude in the definition and use of these terms, and Title I documents seem to jump from one to the other in an unorganized and confusing manner. Both terms could not only be used for one school's remedial reading program, but also for a state's math program containing different curricula for several grade levels. USOE guidelines sometimes use the term "program" in the same context in which the regulations have used "project." These inconsistencies can do little to clarify requirements from a school superintendent's point of view.

Requirements for actual Title I projects are a mixture of general and specific directives, and "suggestions."[5/] The terminology is

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5/ Many directives in USOE publications contain the verb "should" rather than the legally appropriate "shall" or "must." The case can be made that a phrase such as "resources should be concentrated on those children...." (Program Guide #44, Sec. 4.2) is more a suggestion than a mandatory regulation.

sometimes precise and sometimes quite the opposite. Examples of general directives include: that the program be conducted in a limited number of attendance areas,[6] that funds be concentrated on a limited number of projects,[7] that projects be designed to meet a limited number of high priority needs,[8] and that each project concentrate services on a limited number of children[9] so that the services provided will be of "sufficient size, scope and quality to give reasonable promise"[10] of success. In addition, the project should be part of a comprehensive compensatory education program, using other federal and state money where available, and avoiding duplication of programs which could be funded from other sources.[11] Specific stipulations include spending a minimum of $2500/LEA program,[12] expenditures per child of at least one half the amount that is spent for his regular school program,[13] and the requirement that Title I grant applications must state clearly how the project's objectives are related to educational needs which have been identified in needs assessment.[14] Other specific requirements

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6/ Program Guide #44 (4.6).

7/ 45 CFR 116.18 (e).

8/ Program Guide #44 (4.2).

9/ 45 CFR 116.17 (c).

10/ 45 CFR 116.18 (a) (e).

11/ 45 CFR 116.24.

12/ 45 CFR 116.18 (a).

13/ Program Guide #44 (4.7).

14/ 45 CFR 116.18 (b).

concern in-service training of Title I staff,[15] written plans for evaluating the program,[16] the dissemination of Title I information to interested citizens,[17] using Title I money for school construction,[18] and purchasing necessary equipment with Title I funds.[19]

This list of directives suggests the confusion that occurs in the use of a term such as "concentration," which refers to several issues and, as Planar (1972) points out, provides an excellent example of imprecise terminology. There are at least three distinct types of concentration involved:

1. Service concentration in attendance areas having the highest incidence of poverty.

2. Financial concentration in terms of expenditures per child and the number of children involved in a project.

3. Project concentration, in terms of meeting a limited number of high priority needs.

The issue of comparability, on the other hand, is precisely stated both in the law and the regulations.[20] The law states:

> State and local funds will be used in the district of such (local education) agency to provide services in project areas which, taken as a whole, are at least comparable to services being provided in areas in such district which are not receiving funds under (Title I). 20 USC 241 e (a)(3) (C).

15/ Program Guide #44 (5.2).

16/ 20 USC 241 e (a) (6).

17/ 45 CFR 116.17 (n).

18/ 45 CFR 116.17 (i).

19/ 45 CFR 116.53 (c) (7).

20/ This discussion of comparability is largely paraphrased from Lawyers' Committee for Civil Rights Under Law (1973), pp. 1-2.

In other words, the comparability requirements, if enforced, ensure that school districts use Title I funds to supplement rather than supplant state and local funds. Comparability is measured by comparing each Title I school's expenditures to the average expenditure in all local non-Title I schools which serve a similar grade-span. Three criteria are used: the ratio of enrolled pupils to full-time instructional staff; the expenditure per pupil for instructional salaries; and the expenditure per pupil for other instructional costs. (45 CFR 116.26 (c)).' Comparability regulations are, throughout, clearly stated and therefore enforceable in a court of law.

Pupil Selection

Little information is available on the procedures by which Title I pupils are selected. Program Guide #44 states only that educational criteria must be used to select pupils once project areas have been determined. Moreover, the relationship between prior needs assessment and pupil selection is not defined. The Planar Corporation Report (September 1972) describes this lack of clarity.

> Is needs assessment, for example, to be directed at identifying both the nature and degree of educational need in various attendance areas and the specific pupils with various needs? If so, and such would seem a logical procedure, needs assessment is to be more comprehensive and systematic than the material suggests. When aggregated at the school building level, opinions of teachers, community, parents, and group test scores are satisfactory for identifying nature and degree of educational need for a total building population, but unless such information is gathered and retained on an individual pupil basis, a second pupil assessment must be conducted to screen for potential project participants. (pp. 55-56).

Although quantitatively more information exists regarding the selection of pupils attending private schools, there are still unanswered questions. Program Guide #44 states that non-public school officials must be involved in the project planning and needs assessment of "children in the eligible public school attendance areas who are enrolled in private schools" (p. 10). It also states that needs assessment "...provide the basis for...selecting the private school children for whom services are to be provided." (p. 10.) However, the major problem is how to identify these children in the first place. The Planar Corporation Report (1972) again describes the problem clearly.

> Is the LEA responsible for identifying income levels and school affiliations of all non-public school children residing in eligible attendance areas, and then for contacting the non-public schools which these children attend, to gather information on their needs? Or is the LEA first to contact non-public schools in the district or neighboring districts and ask non-public school officials to locate pupils who reside in Title I eligible areas, and have special educational needs? The exhortations to serve non-public school pupils carry with them such unanswered logistical problems. Particularly in large districts, the public school officials risk spending inordinate amounts of time tracking down pupils and contacting schools. (p. 56.)

USOE published a handbook in 1971 specifically describing the participation of private school children in Title I programs. Although it states the point that private school participants must meet both the residence and educational-need qualifications, the process of identification remains unclear. This situation will no doubt become more complex due to the by-pass provisions in the 1974

Amendments. The Commissioner of Education is now required to arrange programs for eligible private school children if the LEA is prohibited by law from providing Title I services, or if it has "substantially failed" to involve such children in its Title I programs. In short, the whole process of assessing, identifying and selecting public and private school pupils for Title I projects is not all clearly defined.